

EXHIBIT 11

Kevin Rayhill

From: Stacey Grigsby <SGrigsby@BSFLLP.com>
Sent: Monday, July 24, 2017 11:13 AM
To: Joseph Saveri; Marcy Norwood Lynch; Michael Dell'Angelo; Daniel Silverman; Kevin Rayhill; Eric L. Cramer; Ben Brown; Don Springmeyer; Patrick Madden
Cc: Nicholas Widnell; Rory Skaggs; Evan North; Brent Nakamura; J. Colby Williams
Subject: RE: Le v. Zuffa, Production Correspondence

Joe,

Zuffa will provide a privilege log addendum for these documents this week, as well as for the other Dana White-related documents addressed in our July 17 letter to the Court.

These documents were included on the July 11 revised privilege log, with the exception of ZFL-2764275 to ZFL-2764278, which were removed from the privilege log for production but were inadvertently excluded from Production 46.

As you know, and as we explained in greater detail in our response to your recent motion to compel, we hosted an in-person meet and confer at our D.C. offices on June 20, 2017 with Matt Weiler. Based on that meet and confer and the agreements reached with Matt Weiler during that session, Zuffa believes that it has re-reviewed the documents Plaintiffs requested that it re-review. To the extent Plaintiffs now want Zuffa to reexamine additional categories of documents, we are willing to discuss specific entries that Plaintiffs believe should be reconsidered. Once Plaintiffs identify such entries/documents, Zuffa may produce additional documents.

Best,
Stacey

Stacey K. Grigsby

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From: Joseph Saveri [mailto:jsaveri@saverilawfirm.com]
Sent: Sunday, July 23, 2017 7:40 PM
To: Marcy Norwood Lynch; Michael Dell'Angelo; Daniel Silverman; Kevin Rayhill; Eric L. Cramer; Ben Brown; Don Springmeyer; Patrick Madden
Cc: Nicholas Widnell; Stacey Grigsby; Rory Skaggs; Evan North; Brent Nakamura; J. Colby Williams
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I didn't see this during the Epstein deposition or prior to the time I spoke to Stacey and Even after the deposition.

Will this require an update to the privilege log? Are the documents contained in the production on the latest iteration of the privilege log we received (on July 11).

As of now, do you intend to produce any additional documents?

From: Marcy Norwood Lynch [<mailto:mlynch@BSFLLP.com>]

Sent: Friday, July 21, 2017 3:46 PM

To: Michael Dell'Angelo <MDellangelo@bm.net>; Daniel Silverman <DSilverman@cohenmilstein.com>; Kevin Rayhill <krayhill@saverilawfirm.com>; Joseph Saveri <jsaveri@saverilawfirm.com>; Eric L. Cramer <ecramer@bm.net>; Ben Brown <BBrown@cohenmilstein.com>; Don Springmeyer <DSpringmeyer@wrslawyers.com>; Patrick Madden <PMadden@bm.net>

Cc: Nicholas Widnell <nwidnell@bsfllp.com>; Stacey Grigsby <SGrigsby@bsfllp.com>; Rory Skaggs <RSkaggs@BSFLLP.com>; Evan North <ENorth@BSFLLP.com>; Brent Nakamura <bnakamura@BSFLLP.com>; J. Colby Williams <jcw@campbellandwilliams.com>

Subject: Le v. Zuffa, Production Correspondence

Counsel,

Please see the attached production correspondence.

You can access the zip file on the FTP site at the following location and log in (Filezilla or a similar file server program is recommended for ease of downloading):

- a. Host box: <https://rationalretention.com>
- b. Port: 22
- c. Protocol: SFTP – SSH File Transfer Protocol
- d. Logon Type: Normal
- e. User: securesite166
- f. Password: 3R2nacRu
- g. File Path: Le v. Zuffa Production 47

I will e-mail the zip container password under separate cover.

Regards,
Marcy

Marcy Norwood Lynch
Counsel

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